

# Exhibit 2

Excerpt of the Deposition of Tobias Woolridge, dated January 25,  
2024

Filed Under Seal

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

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5 EVERETT BLOOM, an individual on  
behalf of himself, the general  
public, and those similarly  
situated,

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7 Plaintiff,

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vs.

9 Case No.:  
10 ZUFFA, LLC,  
11 Defendants.  
12 /

**HIGHLY  
CONFIDENTIAL**

12 \*\*\* HIGHLY CONFIDENTIAL \*\*\*  
13 Remote Deposition Of  
14 TOBIAS WOOLDRIDGE  
Thursday, January 25, 2024

15 **CERTIFIED COPY**

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STENOGRAPHICALLY REPORTED  
BY: DEBORAH FUQUA, CSR #12948  
CERTIFIED STENOGRAPHIC REPORTER

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[REDACTED]

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event data is received, it has the integer -- well,  
assuming that the c\_user cookie was transmitted as part  
of it, it has the integer value of the Facebook ID  
present in the Pixel event data, correct?

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ATTORNEY RABBANI: Objection to form.

THE WITNESS: I don't know if I would

itize the user cookie as part of the URL.

to necessary.

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THE JOURNAL OF CLIMATE

The image shows a single page of a document where all the text has been removed. This is done using horizontal black bars of varying lengths. There are approximately 20 such bars, each covering several lines of text. The first bar is at the top, followed by a larger one, then a shorter one, then another longer one, and so on, creating a pattern of alternating lengths. The bars are solid black and extend across the width of the page.

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[REDACTED]

[REDACTED]

13 Q. I guess what I mean is Meta can use

14 information other than -- let's see. Let me think  
15 about how to rephrase that.16 Yeah. So I guess I'm asking about focusing on  
17 the event data that's transmitted through the Meta  
18 Pixel, even if the -- I guess to start over, Meta can  
19 associate event data with a Facebook user even if that  
20 event data does not include a Facebook ID, correct?

21 ATTORNEY EDELSTEIN: Form.

22 THE WITNESS: Meta can associate data to  
23 Facebook user even if that event data was not  
24 transmitted with a Facebook user ID.

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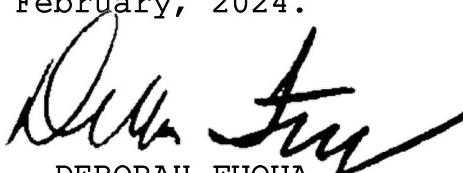
1 STATE OF CALIFORNIA )  
2 ) ss.  
COUNTY OF MARIN )

3 I, DEBORAH FUQUA, a Certified Shorthand  
4 Reporter of the State of California, duly authorized to  
5 administer oaths pursuant to Rule 30(b)(6) of the  
6 Federal Rules of Civil Procedure, do hereby certify  
7 that

8 TOBIAS WOOLDRIDGE,  
9 the witness in the foregoing deposition, was by me duly  
10 sworn to testify the truth, the whole truth, and  
11 nothing but the truth in the within entitled cause;  
12 that said testimony of said witness was reported by me,  
13 a disinterested person, via a web conferencing platform  
14 and was thereafter transcribed under my direction into  
15 typewriting and is a true and correct transcription of  
16 said proceedings.

17 I further certify that I am not of counsel or  
18 attorney for either or any of the parties in the  
19 foregoing deposition and caption named, nor in any way  
20 interested in the outcome of the cause named in said  
21 caption.

22 Dated the 8th day of February, 2024.  
23  
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25 DEBORAH FUQUA  
CSR NO. 12948